

1
2
3
4
5
6 UNITED STATES DISTRICT COURT FOR THE
7 WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9
10 EDITHA DAMASCO,

11 Plaintiff,

12 v.

13 UNITED STATES OF AMERICA,

14 Defendant(s).
15

CASE NO. 2:17-cv-641-RSM

STIPULATED MOTION TO
EXTEND INITIAL SCHEDULING
DATES AND PROPOSED ORDER

16 **JOINT STIPULATION**
17

18 COMES NOW the Plaintiff, Editha Damasco, through her attorney, David H.
19 Zielke, and Defendant, the United States of America, through its counsel, Tricia Boerger,
20 Assistant United States Attorney, in this stipulated motion to extend the initial scheduling
21 dates in this matter as follows:
22

23 Deadline for FRCP 26(f) Conference: 07/13/2017

24 Initial Disclosures Pursuant to FRCP 26(a)(1): 07/20/2017

25 Combined Joint Status Report and Discovery
26 Plan as Required by FRCP 26(f) and Local
27 Civil Rule 26(f): 07/27/2017
28

1 This extension is necessary because the United States was only recently served
2 and has not yet filed an answer or had adequate time to confer with the federal agency or
3 understand the facts or nature of the case sufficient to participate in a discovery
4 conference, submit initial disclosures or prepare a discovery plan. The United States'
5 answer is due on July 3, 2017. As such, the parties are requesting an extension of time
6 for the initial scheduling dates to allow them time to review the initial pleadings and
7 participate meaningfully in the FRCP 26 process.
8

9 The parties through their counsel further agree that neither party will be prejudiced
10 by this agreement.
11

12 DATED this 2nd day of June, 2017.
13

14 Respectfully submitted,
15

16 ANNETTE L. HAYES
17 United States Attorney

18 s/ David H. Zielke

19 DAVID H. ZIELKE, WSBA #36494
20 The Law Firm of David H. Zielke, PS
21 2122 112th Ave. NE, Suite A-300
22 Bellevue, WA 98004
23 Telephone: (425) 202-7743
24 Fax: (425) 202-7742
25 Email: david@zielkelawfirm.com
26
27
28

s/ Tricia Boerger

TRICIA BOERGER, WSBA #38581
Assistant United States Attorney
Western District of Washington
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Email: tricia.boerger@usdoj.gov

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 0
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8

Deadline for FRCP 26(f) Conference:	07/13/2017
Initial Disclosures Pursuant to FRCP 26(a)(1):	07/20/2017
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	07/27/2017



UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970